

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

February 12, 2009

Ms. Kristina Heister, Natural Resource Manager Valley Forge National Historical Park 1400 North Outer Line Drive King of Prussia, PA 19406

Subject: Draft White-tailed Deer Management Plan/Environmental Impact Statement Valley Forge National Historical Park King of Prussia, PA December 2008 CEQ # 20080519

Dear Ms. Heister:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (EPA) has reviewed the subject document. The purpose of the Draft Environmental Impact Statement (DEIS) is to develop a deer management plan that supports protection, preservation, and restoration of native vegetation and other natural and cultural resources throughout and beyond the life of this Plan/DEIS. The purpose of the Plan/DEIS also is to provide appropriate response to chronic wasting disease at Valley Forge NHP. The DEIS states that there are approximately 193 deer per square mile in the park. The deer density goal is 31-35 deer per square mile.

The preferred Alternative is Alternative D, Combined Lethal and Nonlethal Actions. Initially this alternative would use lethal reduction via sharpshooting and capture/euthanasia to quickly reduce the deer population and achieve the initial deer density goal. Population maintenance would be conducted via reproductive control when an acceptable agent becomes available. Until an acceptable and effective reproductive control agent becomes available, population maintenance would be conducted using lethal methods.

Based on our review we rate this DEIS, Lack of Objections (LO). A description of our rating system can be found at: http://www.epa.gov/compliance/nepa/comments/ratings.html. Thank you for the opportunity to offer these comments. If you have any questions, please contact me at (215)814-3330.

Sincerely,

Barbara Okorn, Environmental Scientist
Office of Environmental Programs